

**THE LAW OFFICES OF RICHARD MALAGIERE**

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Attorneys for Plaintiff, David Lorenzo

**UNITED STATE DISTRICT COURT  
DISTRICT OF NEW JERSEY**

DAVID LORENZO

*Plaintiff,*

v.

THE BOROUGH OF PALISADES  
PARK, NEW JERSEY; CHONG PAUL  
KIM (individually and in his official  
capacity as Mayor of the Borough of  
Palisades Park, New Jersey); and SUK  
“JOHN” MIN (individually and in his  
official capacity as a member of the  
Borough Council of Palisades Park, New  
Jersey

*Defendants.*

Hon. Claire C. Cecchi, U.S.D.J.

Hon. José R. Almonte, U.S.M.J.

Civ. No.: 2:23-CV-21849-CCC-JRA

CIVIL ACTION

**DECLARATION OF  
LEONARD E. SEAMAN**

I, Leonard E. Seaman, submit this declaration in support of plaintiff, David Lorenzo's, opposed motion for leave to file a first amended complaint:

1. I am an attorney-at-law of the State of New Jersey and a member of the bar of the United States District Court for the District of New Jersey. I am of counsel

with The Law Offices of Richard Malagiere, attorneys for plaintiff David Lorenzo in the above captioned matter.

2. I am personally familiar with the facts in this matter and I make this declaration in support of plaintiff's motion for leave to file a first amended complaint in this action.

3. Attached hereto as **Exhibit A** is a copy of the proposed First Amended Complaint in this matter.

4. Attached hereto as **Exhibit B**, pursuant to *L. Cv. R. 15.1(a)(2)*, is a form of the amended pleading that indicates in what respects it differs from the initial complaint.

5. On March 14, 2024, I provided defendants' counsel with a copy of the proposed first amended complaint and asked if defendants would consent to filing it to avoid the need for this motion.

6. Since counsel did not respond, I called defendants' counsel on March 20, 2024 to confer about plaintiff's request for consent. As counsel was not available, I left a message with his office staff requesting a call back.

7. As of the date of this declaration, counsel for defendants have not responded to either my March 14 email or my March 20 phone call seeking to confer on the proposed first amended complaint.

Pursuant to 28 *U.S.C.* §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

s/ Leonard E. Seaman  
RICHARD MALAGIERE  
LEONARD E. SEAMAN  
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Dated: March 21, 2024